

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

United States of America,

Plaintiff,

v.

Civil Action No.: 1:24-cv-1345 (MAD/DJS)

One 2003 Ferrari Enzo AB Version E,
VIN #: ZFFCZ56B000132659;

One 2014 Ferrari LaFerrari, VIN #:
ZFF76ZHB000203166;

One 2022 Mercedes Benz, VIN #:
W1NYC8AJXNX445045;

One 1982 Mercedes Benz 500SL, VIN #:
WDB10704612001675;

One 1989 Mercedes Benz 560 SEL, VIN
#: WDB1260391A497466;

One 2007 Mercedes Benz SLR McLaren,
VIN #: WDDAJ76F27M001391;

One 1987 Mercedes Benz 560, VIN #:
WDB1260451A315331;

One 2004 Porsche Carrera, VIN #:
WP0ZZZ98Z4L000069;

One 2022 Ferrari 812 Competizione, VIN
#: ZFF03TLA5N0277054;

One 2020 Mercedes Benz GT63C4S, VIN
#: WDD7X8KB3LA012445;

One 2006 Maserati MC 12 Corse, VIN #:
ZAMDF44B000029626;

One 2023 Mercedes Benz, VIN #:
W1K6X7KB5PA204980;

One Ferrari Engine Table;

\$223,365.00 in U.S. currency seized from Thread Bank Account ending 7554 held in the name of ABBJ, LLC;

\$467,810.00 in U.S. currency seized from Thread Bank Account ending 1832 held in the name of Capital Investments US, LLC;

Refund in the amount of \$72,825.83 in U.S. Currency seized from Ai Design;

One Richard Mille RM011 watch with serial number 2722;

One Richard Mille RM 65-01 Watch;

One Rolex Watch, Serial Number: Y74R6549;

One Rolex Watch, Serial Number: 7P65S042;

One Rolex Watch, Serial Number: 0WU66577;

One Rolex Watch, Serial Number: 65R11547; and

One Rolex Watch, Serial Number: 8S927086.

Defendants.

WARRANT FOR ARREST OF ARTICLES *IN REM*

TO THE UNITED STATES MARSHAL OF THE NORTHERN DISTRICT OF NEW YORK OR ANY SUBCONTRACTOR THEREOF AND/OR ANY OTHER DULY AUTHORIZED LAW ENFORCEMENT OFFICER:

WHEREAS, a complaint of forfeiture was filed on November 5, 2024, in the United States District Court for the Northern District of New York, by CARLA B. FREEDMAN, United States

Attorney and Elizabeth A. Conger, Assistant United States Attorney, on behalf of the United States of America, plaintiff, alleging that the Defendant Properties are subject to seizure and forfeiture to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C).

YOU ARE, THEREFORE, HEREBY COMMANDED to arrest and seize Defendant Properties, and use discretion and whatever means appropriate to protect and maintain the Defendant Properties; and

YOU ARE FURTHER COMMANDED to provide notice of this action to all persons thought to have an interest in or claim against the Defendant Properties and to promptly, after execution of this process, file the same in this Court with your return thereon.

All persons asserting an interest in the Defendant Properties and who have received direct notice of the forfeiture action must file a verified claim with the Clerk of this Court pursuant to Rule G(5) of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims, **thirty-five (35) days after the notice is sent**; or if notice was published but direct notice was not sent to the claimant or the claimant's attorney, a claim must be filed no later than sixty (60) days after the first day of publication on an official government internet website, www.forfeiture.gov; or within the time that the Court allows, provided any request for an extension of time from the Court is made prior to the expiration of time which the person must file such verified claim. In addition, any person having filed such a claim shall also serve and file an answer to the complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure within twenty-one (21) days after filing the claim.

Supplemental Rule G(5) provides in pertinent part: "The claim must: (A) identify the specific property claimed; (B) identify the claimant and state the claimant's interest in the property;

(C) be signed by the claimant under penalty of perjury; and (D) be served on the government attorney designated under Rule G(4)(a)(ii)(C) or (b)(ii)(D).”

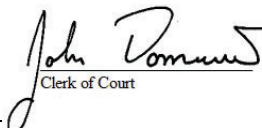

All persons asserting an interest in the Defendant Properties are required to file a claim in the Clerk’s Office and to answer the complaint within the times above fixed: otherwise, judgment by default will be filed for the relief demanded in the complaint.

Claims and Answers are to be filed with the Clerk, United States District Court for the Northern District of New York, James T. Foley Courthouse, 445 Broadway, Albany, New York 12207 with a copy thereof sent to Carla B. Freedman, United States Attorney, Northern District of New York, Elizabeth A. Conger, Assistant United States Attorney, United States Attorney’s Office, James Hanley Federal Building, 100 South Clinton Street, Room 900, Syracuse, New York 13261.

This warrant is issued pursuant to Rule G(3) of the Supplementary Rules for admiralty or Maritime and Asset Forfeiture Claims of the Federal Rules of Civil Procedure.

November 5, 2024

Date


Clerk of Court 

Clerk

S/Matthew Gerace

(By) Deputy Clerk

UNITED STATES MARSHAL'S RETURN

Northern New York
District

Date Received

Date Executed

U.S. Marshal

(By) Deputy Marshal
